

MICHELE BECKWITH
Acting United States Attorney
CODY S. CHAPPLE
ROBERT L. VENEMAN-HUGHES
Assistant United States Attorneys
2500 Tulare Street, Suite 4401
Fresno, CA 93721
Telephone: (559) 497-4000
Facsimile: (559) 497-4099

Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

RAYMOND JESSE RODRIGUEZ,

Defendant.

CASE NO. 1:24-CR-00142-KES-BAM

**AMENDED STIPULATION TO CONTINUE
STATUS CONFERENCE AND EXCLUDE TIME**

The parties stipulate as follows:

1. A grand jury indicted the defendant on June 20, 2024, charging him in count one of violating 18 U.S.C. § 922(g)(1) – Felon in Possession of Ammunition. The defendant appeared and was detained on June 21, 2024. This case is set for a status conference on April 9, 2025. Time has been excluded to that date.

2. The government produced initial discovery on June 26, 2024, and supplemental discovery on July 22, 2024. On August 6, 2024, defense made a plea offer to the government. The government made its own plea offer on October 15, 2024, which had expired. The parties are still discussing a resolution.

3. On December 9, 2024, defendant's counsel withdrew, and the Court appointed Adilene Flores Estrada to represent the defendant on December 13, 2024. The government re-produced its discovery to Ms. Flores Estrada on December 17, 2024. The government intends to extend a plea offer to

the defendant's new counsel.

4. Now, the parties agree to continue the status conference from April 9, 2025, to June 11, 2025, to further provide defendant with reasonable time necessary for effective preparation, so that the defendant can review the discovery, and for defendant to consider a pre-trial resolution of the case.

5. The parties agree this will be the last continuance before asking the court to set this matter for trial.

6. The parties agree that the interests of justice served by granting this continuance outweigh the best interests of the public and the defendant in a speedy trial. The parties also agree that the period from April 9, 2025, through June 11, 2025, should be excluded. Fed. R. Crim. P. 17.1; 18 U.S.C. § 3161(h)(7)(A) and (h)(7)(B)(iv).

IT IS SO STIPULATED.

Dated: April 3, 2025

MICHELE BECKWITH
Acting United States Attorney

/s/ Cody Chapple
Cody Chapple
Robert L. Veneman-Hughes
Assistant United States Attorney

Dated: April 3, 2025

/s/ Adilene Flores Estrada
Adilene Flores Estrada
Law Office of Adilene Flores Estrada
Counsel for RAYMOND JESSE
RODRIGUEZ

ORDER

The Court has read and considered the parties' stipulation to continue the status conference and exclude time. The Court finds there is good cause for the continuance so as to allow the defendant reasonable time to complete his review of the discovery and fully consider a pre-trial resolution of the case. The Court also finds that the interests of justice served by granting the continuance outweigh the interests of the public and the defendant in a speedy trial.

Therefore, for good cause shown:

1. The status conference is continued from April 9, 2025, until **June 11, 2025, at 1:00 p.m. before Magistrate Judge Barbara A. McAuliffe**; and
2. The period from April 9, 2025, through June 11, 2025, shall be excluded pursuant to Fed. R. Crim. P. 17.1; 18 U.S.C. § 3161(h)(7)(A) and (h)(7)(B)(iv).

IT IS SO ORDERED.

Dated: **April 3, 2025**

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE